

Exhibit B

NORTH CAROLINA
GUILFORD COUNTY

GUILFORD COUNTY	FILED
JUL 18 2019	
AT <u>10:00</u>	O'CLOCK
BY <u>KWL</u>	<u>A</u> M
CLERK OF SUPERIOR COURT	

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO.: 19-CVS- 7140

CYNTHIA BARBOUR, in her capacity as)
Trustee under the Admiralty M Trust, and)
JULIA LUNN, in her capacity as Trustee)
under the Admiralty M Trust, and ADAM)
SPIEGEL,)
Plaintiffs,)
v.)
TD AMERITRADE, INC., STEVEN)
KEARNS, and LAUREN SCOTT,)
Defendants.)

**MOTION FOR
TEMPORARY RESTRAINING
ORDER**

COME NOW the Plaintiffs, Cynthia Barbour and Julia Lunn, co-trustees of the Admiralty M Irrevocable Trust u/w/a November 17, 2011, by and through their undersigned counsel, and pursuant to N. C. R. Civ. P. 65, hereby moves for an order temporarily restraining the Defendant TD Ameritrade, Inc. along with its agents, servants, attorneys, and all other persons in active concert or participation with the Defendant TD Ameritrade, Inc. from disbursing or distributing any funds in TD Ameritrade Account No. [REDACTED] 6941 pending further order of this Court.

This Motion is based upon the Verified Complaint filed in this action. Counsel for Cynthia Barbour and Julia Lunn, co-trustees of the Admiralty M Irrevocable Trust u/w/a November 17, 2011 certifies that counsel gave notice of the time and date for a hearing on these Plaintiffs' intention to seek the relief requested herein by email on July 17, 2019 to all defendants, and by facsimile number to the Defendant TD Ameritrade using the facsimile number counsel for these Plaintiffs was instructed by a representative of TD Ameritrade for communication with TD Ameritrade.

WHEREFORE, Plaintiffs Cynthia Barbour and Julia Lunn, co-trustees of the Admiration M Irrevocable Trust u/w/a November 17, pray that their Motion be granted and that TD Ameritrade be temporarily restrained from disbursing or distributing any funds in TD Ameritrade Account No. [REDACTED] 6941 pending further order of this Court.

Respectfully submitted this 18th day of July, 2019.



Scott K. Tippett, NCSB #22488
Counsel for the Plaintiffs,
Cynthia Barbour and Julia Lunn,
Co-trustees of the Admiration M
Trust

Of Counsel:

HAGAN BARRETT, PLLC
300 N. Greene St., Suite 200
Greensboro, NC 27401
(336) 232-0650

CERTIFICATE OF SERVICE

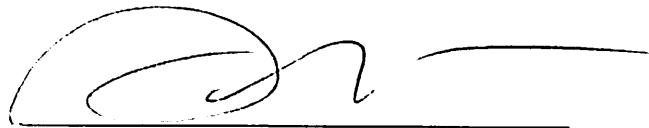
I, Scott K. Tippett, hereby certify that on this day I have emailed and served a copy of the foregoing **Motion for Temporary Restraining Order** upon counsel of record by hand delivery or depositing a copy thereof in a postpaid and properly addressed wrapper in a post office or official depository under the exclusive care and custody of the United States Postal Service addressed as follows:

Ms. Lauren Scott
boingercat@scottopia.com
22 Astor Place
Williston Park, NY 11596

Mr. Steven Kearns
skearns23@yahoo.com
2818 Juniper Street
San Diego, CA 92104

TD Ameritrade, Inc.
estates@tdameritrade.com
via facsimile (402) 970-8420
176 Mine Lake Ct., Suite 100
Raleigh, NC 27615-6417

This the 18th day of July, 2019.



Scott K. Tippett
Counsel for the Plaintiffs,
Cynthia Barbour and Julia Lunn,
Co-trustees of the Admiralty M
Trust

Of Counsel:

HAGAN BARRETT, PLLC
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